



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

FEE

DOCUMENT CONTAINS CONFIDENTIAL INFORMATION

DATE OUT: November 8, 2019

SUBJECT: PRODUCT CHEMISTRY REVIEW OF MP ☐ EP ☒

DP BARCODE No.: 454798

File Symbol No.: 52287-EU

ACTION CODE: R300

DECISION No.: 555404

COMPANY: Harrell's LLC

PRODUCT NAME: "Fertilizer with Ronstar 1.0"

PC Codes: 109001

William Herald / Microbiologist/Chemist REHS/Registered Sanitarian
Product Chemistry Team
Chemistry, Inerts and Toxicology Assessment Branch (CITAB) RD (7505P)

William Herald
8/15/19
12/11/19

TO: Francisco Llarena /Shaja Joyner . RM 22
Fungicide and Herbicide Branch / RD (7505P)

INTRODUCTION:

Registrant has submitted an application for the registration of the end use product "Fertilizer with Ronstar 1.0". In support of the registration application, Registrant has submitted 830 series group A and group B product chemistry data with MRID No. 46464501 and 40968001 . CITAB has been asked to determine acceptability of the data submitted and the proposed Basic and Alt. Nos. A, B and C CSF formulations all four dated July 17, 2019.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient: Oxadiazon (1%)

2. Has the registrant claimed substantial similarity to a registered product?

☒ Yes; ☐ No; ☐ NA; The registration number of the cited product EPA Reg. No. 432-1468.

3. All of the source materials of the active ingredient are derived from registered sources- ☒ Yes ☐ No.

4. All inert ingredients have been screened by IIAB, and found to be approved for the proposed labeled uses.
☒ Yes. No inerts for review.

5. Confidential Statement of Formula:

☒ Basic - Dated: July 17, 2019.

☒ Alternate CSF Nos. A, B and C Dated July 17, 2019

Alternate CSF(s) complies with 40CFR§152.43: ☒ Yes; ☐ No; ☐ NA

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6. Product label

- a. Ingredient statement: Nominal concentration of Al. listed on CSF concurs with product label (PR Notice 91-2).
☒ Yes; ☐ No; if not, explain:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)
☒ Yes; ☐ No; if not, explain below

Metallic equivalent: ☒ NA;
Soluble arsenic: ☒ NA
Isomeric ratios: ☒ NA
Acid Equivalent: ☒ NA

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes; ☒ No; ☐ NA
Methanol at > 4%: ☐ Yes; ☒ No; ☐ NA
Sodium nitrate/sodium nitrite ☐ Yes; ☒ No; ☐ NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?
☒ Yes ☐ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?
☒ Yes; ☐ No; ☐ NA; if not, explain below

- d. Label requires an additional Storage and Disposal statement: ☒ Yes ☐ No; If yes explain below:

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7. Group A: Product Chemistry Data

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

| Guideline No. | Study Title | | Data submitted | | CITAB's Assessment of Data | MRID Nos. |
|---------------|--|--------------------------------|----------------|----|----------------------------|-----------|
| | | | Yes | No | | |
| 830.1550 | Product Identity & Composition | | X | | A | 46464501 |
| 830.1600 | Description of materials used to produce the product | | X | | A | 46464501 |
| 830.1650 | Description of formulation process | | X | | A | 46464501 |
| 830.1670 | Discussion on the formation of impurities: | | X | | A | 46464501 |
| 830.1700 | Preliminary analysis | | | | NA | |
| 830.1750 | Certified limits (158.350) | Standard certified limits | X | | A | 46464501 |
| | | Proposed Limits | X | | A | |
| | | Justification for wider limits | X | | A | |
| 830.1800 | Enforcement analytical method | | X | | A | 40968001 |

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

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8. Group B:

| Guideline No. | Study Title | Value or Qualitative Description | CITAB's Assessment of Data | MRID Nos. |
|---------------|-----------------------------------|----------------------------------|----------------------------|-----------|
| 830.6303 | Physical State | G | N | 46464501 |
| 830.6314 | Oxidation/Reduction | G | N | 46464501 |
| 830.6315 | Flammability | G | N | 46464501 |
| 830.6316 | Explosibility | G | N | 46464501 |
| 830.7000 | pH of 24.5% TS in distilled water | G | N | 46464501 |
| 830.7100 | Viscosity | G | N | 46464501 |
| 830.7300 | Density (Specific gravity) | G | N | 46464501 |
| 830.6317 | Storage stability | G | N | 46464501 |
| 830.6320 | Corrosion characteristics | G | N | 46464501 |

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CONCLUSIONS:

CITAB has reviewed the product chemistry data submitted/cited for the end-use product and has concluded that:

A. Substantially similarity to the cited product () from Product Chemistry view point

☒ Similar

☐ Not similar give reason: Inert ingredients are significantly dissimilar.

☐ Identical

☐ Not identical

☐ Not applicable

B. Confidential Statement of formula

1. Basic CSF (dated July 17, 2019)

☒ Acceptable

☐ Not Acceptable

If not acceptable provide the reasons

Alternate Nos. A, B and C CSFs (dated July 17, 2019)

Acceptable –

☒ Yes

☐ Not Acceptable

☐ Not Applicable

If not acceptable give reasons

C. Group A Product Chemistry Data

☒ Acceptable –

☐ Acceptable with the exception of the guidelines.

☐ Not Acceptable

☐ Not Applicable

☐ Data cited

If not acceptable or Partially acceptable give reasons.

D. Group B Product chemistry data

☐ Acceptable –

☐ Acceptable with the exception of the guidelines:

☒ Not Acceptable

☐ Not Applicable

☐ Data cited

If not acceptable or Partially acceptable give reasons. Registrant cites data from MRID's of a product that is not identical with Registrant's product. Data submitted is not applicable or lacking.

Product Label/Draft Label Recommendations – ☐; Yes ☐; No ☒; Not applicable ☐ Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes explain below:

